

JAN 11 1985

Mr. James R. Shell
Chief, Water Division
Arkansas Department of Pollution
Control and Ecology
8001 National Drive
Little Rock, Arkansas 72209

Dear Mr. Shell:

We have reviewed the use attainability analysis for Coffee Creek prepared by Georgia Pacific. This report is inadequate to justify the removal of all fishery and contact recreation uses for the following reasons:

1. The contention that naturally-occurring pollutant concentrations (backwater inundation from the Ouachita River) preclude use attainment is not documented. Why would this be a problem when the Ouachita River is designated for fishery and primary contact recreation uses?
2. The documentation that Coffee Creek is intermittent seems inadequate as it is based only on one year's worth of flow data during low flow conditions. More documentation is necessary regarding the duration of periods with no flow. What is the 7010 (excluding effluent)?
3. It is unsubstantiated that Coffee Creek would not support a fishery and its spawning use during the rainy season. An evaluation should be conducted to determine whether spawning is possible (in the absence of effluent) during the rainy season. The presence of enduring natural pools which could support a fishery should be determined. This data should be included in the use attainability report to support the determination of whether or not spawning is attainable in the absence of effluent. The water stated to be in the abandoned section of Coffee Creek could indicate potentially attainable uses for a fishery and for secondary contact recreation.
4. A biological assessment should have been conducted and included in this report to substantiate whether or not there is an existing fishery use.
5. The contention that the weir prevents fish from entering the system upstream is misleading because there are other methods of introduction. The question of whether artificially or naturally introduced fish can survive and propagate in the absence of the effluent needs to be addressed. If a fishery is potentially attainable, the weir would not represent an irretrievable man-induced condition.

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6. Mossy Lake is included in the Coffee Creek segment; therefore, why is primary contact recreation not attainable? Is the water quality data of the lake nonsupportive of primary contact recreation (in the absence of effluent)? Does the lake dry up during the swimming season? Whatever the reason, documentation is needed.
7. Similarly, why is secondary contact recreation (in the absence of effluent) not potentially attainable? Other Arkansas segments with an ephemeral nature are designated for secondary contact recreation. It should also be noted that access limitations such as privately owned adjacent land, is not adequate justification to preclude use attainability if there is potential for incidental use (i.e., access potential from either upstream or downstream of the area of privately-owned adjacent land).
8. The study did not state and document the expected uses attainable after the implementation of BMPs for nonpoint sources. This evaluation needs to be conducted.
9. The economic and social hardships contended to occur if more stringent controls are implemented need further documentation.
10. This report should be better structured to answer the use attainability questions found in Chapter 3 of the Water Quality Standards Handbook. Inferences on the part of the reviewer should not be necessary.

Thank you for the opportunity to review this use attainability study. These comments, along with those from the SWEPCO and AP&L use attainability analyses, will be part of our upcoming comment letter on the Arkansas Water Quality Standards. Please feel free to contact me at (214)767-8985 or Susan King at (214)767-8987 with questions.

Sincerely,

Larry Champagne
Arkansas State Coordinator, 6W-QS

cc: John Giese, ADPC&E
Bill Keith, ADPC&E

bcc: Susan King, 6M-OT